



March 17, 2020

The Honorable Alison J. Nathan, U.S. District Court Judge  
U.S. District Court for Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Republic of Turkey v. Christie's Inc. and Michael Steinhardt*, 17 Civ. 3086 (AJN)

Dear Judge Nathan,

We write on behalf of all parties to this case – Plaintiff Republic of Turkey, Defendant Christie's Inc., and Defendant Michael Steinhardt – to request a revision to the February 24, 2020 Pretrial Scheduling Order (Dkt #290). This change is necessitated by serious disruption to the pretrial and trial preparation efforts of all parties caused by Covid-19 and government responses thereto.

Plaintiff's counsel require additional time to complete the filings due this Friday, March 20. In an effort to combat the spread of Covid-19 in compliance with New York and U.S. policies, lawyers are working from home. In addition, Plaintiff's law firm must stagger work schedules, so the full complement of support personnel is not available at any time. These disruptions require that extra time be added to the existing schedule for pretrial filings.

With respect to the April 27 trial start date, the parties request an adjournment. Both of Defendants' party representatives, some witnesses for both parties, and several counsel fall into high risk categories due to age and/or underlying health conditions. Plaintiff's expert Dr. Neil Brodie, in addition to having health issues, is forbidden by U.S. regulations from traveling here from the U.K. Two of Turkey's witnesses are under orders from their employers not to travel internationally. Three of Plaintiff's lawyers are above age 70 and one has health issues that places him in the highest risk category. Likewise, Defendant Michael Steinhardt is 79 and recently had major surgery. Defendant Christie's in-house counsel and trial representative is undergoing chemotherapy that adversely affects her immunity to Covid-19. One of Defendants' lawyers is above 70 and has health issues. These issues are unlikely to be resolved in the foreseeable future, necessitating the adjournment of the trial *sine die*.

The Court adopts the parties' proposed revised schedule and adjourns the final pretrial conference and trial *sine die*. By April 27, 2020, the parties shall submit a joint letter proposing new trial dates.  
SO ORDERED.

SO ORDERED

3/19/20

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

Joint Letter to Judge Nathan  
Case No. 17 Civ. 3086  
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The parties submit herewith a proposed revised schedule. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Lawrence M. Kaye

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*Attorneys for Defendants Christie's Inc. and  
Michael Steinhardt*

Enclosure

	<b>Current Date</b>	<b>Proposed New Date</b>
Joint Pretrial Report (Rule 6.A): <ul style="list-style-type: none"> <li>• Statement regarding subject matter jurisdiction</li> <li>• Summary of claims and defenses to be tried</li> <li>• Statement as to number of trial days needed</li> <li>• Any stipulations or agreed statements of fact or law to which all parties consent</li> <li>• List of witnesses who will testify at trial and a brief summary of the substance of each witness' testimony</li> <li>• Designations of deposition testimony to be presented to the court and any counter-designations and objections to admissibility by any other party</li> <li>• Exhibit lists, including any objections to admissibility by the other party</li> <li>• A statement of the damages claimed and any other relief sought</li> </ul>	March 20, 2020	April 3, 2020
Motions <i>in limine</i> (Rule 6.B.)	March 20, 2020	April 3, 2020
Pretrial Memorandum of Law (Rule 6.C.) (optional)	March 20, 2020	April 3, 2020
Trial Exhibits (Rule 6.E.)	March 20, 2020	April 3, 2020
Proposed Findings of Fact and Conclusions of Law (Rule 6.F.i.)	March 20, 2020	April 3, 2020
Deposition Excerpts (Rule 6.F.ii.)	March 20, 2020	April 3, 2020
Direct Testimonies of Trial Witnesses (Rule 6.F.iii.)	March 20, 2020	April 3, 2020
Courtesy Copies (Rule 6.G)		As soon as practically possible after filing
List of Affiants to Cross-Examine (Rule 6.F.iii.)	March 24, 2020	April 8, 2020

Oppositions to motions <i>in limine</i> (Rule 6.B.)	April 3, 2020	April 22, 2020 (3 days added because of religious observances)
Replies to motions <i>in limine</i> (Rule 6.B.)	April 15, 2020	May 1, 2020
Final pretrial conference	April 23, 2020	TBD
Trial Date	Begin on April 27, 2020	TBD